

MCDB Data Release Policy Workgroup

April 1, 2014



Overview of Today's Goals

- Review data product definitions
- Transparency of the review process
 - Environmental scan
 - Review of purpose of data request
 - Review of applicant qualifications
 - Protection of confidentiality and ethics review – IRB
 - DUA compliance

Data Products and Privacy Levels

- Data products vary in availability in identifiable information.
- Public Use Files: most secure / least information
 - Does not release any PHI (e.g. no individual-level identifiable information including demographics, diagnosis, payment information, etc.). Data products provide summaries.
- Limited Data Sets: modestly secure / substantial information
 - Data products have individual-level information, but key fields are scrambled or limited (e.g. scrambled patient ID, limit geographic information, age bands, etc.)
- Research Identifiable Files: less secure / detailed information
 - Data products provide detailed, individual-level information.
- The level of identifiable information will dictate the scrutiny in the review process. Least amount of data needed for a proposed analysis will be released.

Environmental Scan of Claims Data Request Review Process Used by Other APCD States (Part 1)

DRP Elements	Colorado	Maine	Massachusetts	New Hampshire	Oregon	Vermont
<i>Application Review</i>						
Application Form	Detailed form. Variable depending on privacy level. Has a pre-application.	Guidance (list of items to address) for an application. No specific form.	Detailed form. Variable depending on privacy level. Web application.	Detailed form. Variable depending on privacy level	Detailed form. Variable depending on privacy level	No published application, but website references an application that may be requested.
Review committee	Multi-stakeholder Data Release Review Committee	MHDO internal review; may include other state partners if "practitioner identifiable" data requested. Public comment available.	Multi-stakeholder Data Release Review Committee. Public review process.	NH CHIS internal review	Multi-stakeholder Data Release Review Committee. Public review process.	VHCURES internal review.
IRB	Applicant's IRB	Applicant's IRB?	Yes, dedicated third party IRB	?	?	?
Qualifications of Applicant	Formally Assessed	Unkown	Formally Assessed	Formally Assessed	Formally Assessed	Unknown

Environmental Scan of Claims Data Request Review Process Used by Other APCD States (Part 2)

DRP Elements	Colorado	Maine	Massachusetts	New Hampshire	Oregon	Vermont
<i>Data Security</i>						
Data Management Plan	Formal Requirement	Formal Requirement	Formal Requirement	Formal Requirement	Formal Requirement	Formal Requirement
DUA	Required, standardized form	Required	Required	Required	Required, brief form	Required
Data Transfer	Secure media	Secure media	Secure media	Secure media	Secure media	Secure media
Data Destruction	Attestation	Attestation	Attestation	Attestation	Attestation	Attestation
<i>Support Functions</i>						
Documentation	Extensive, tailored to data product and privacy level	Extensive, tailored to data product and privacy level	Extensive, tailored to data product and privacy level	Extensive, tailored to data product and privacy level	Extensive, tailored to data product and privacy level	Extensive
Technical Support	?	?	Provided for a fee.	?	?	?

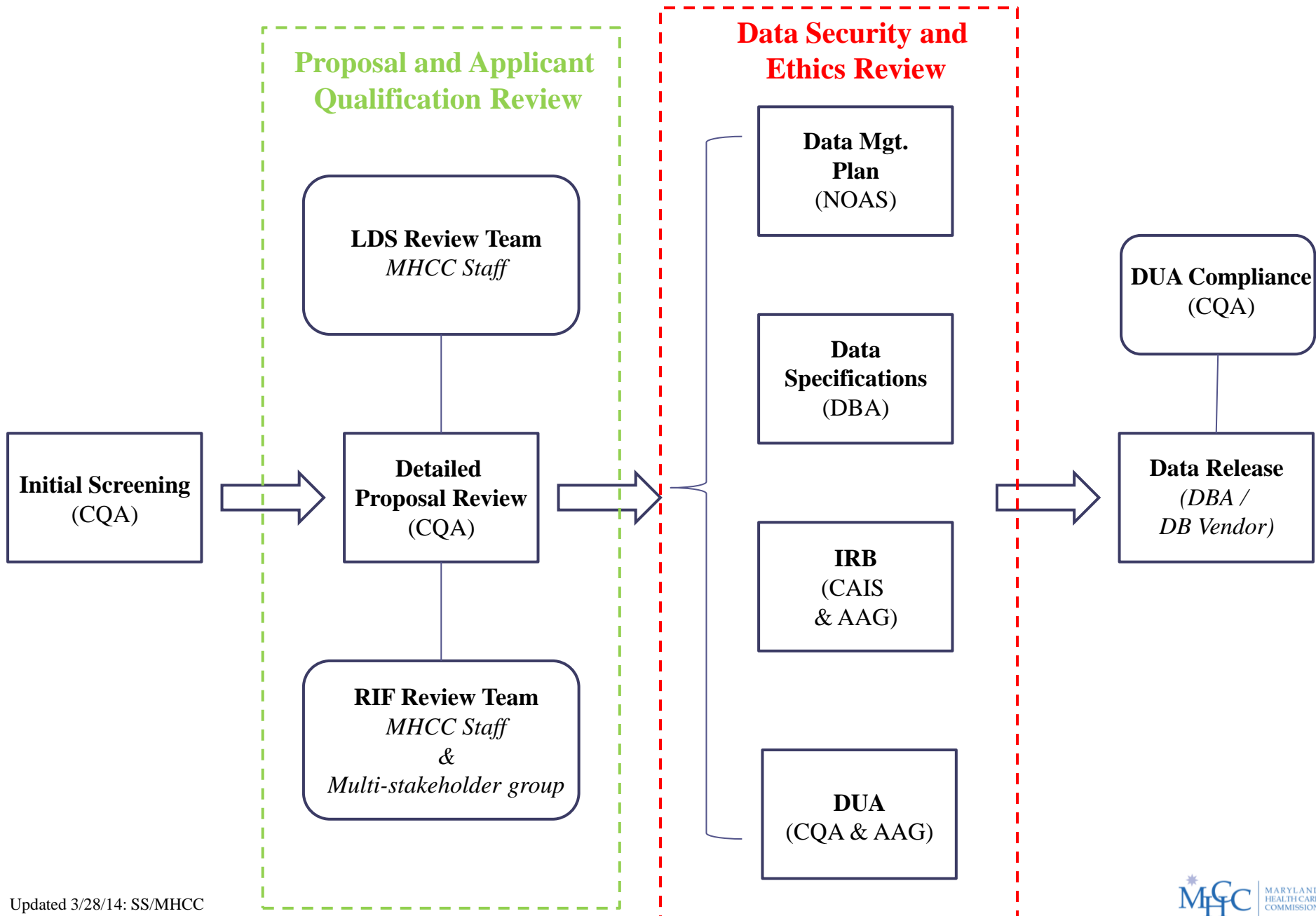
Environmental Scan of Claims Data Request Review Process Used by CMS, HSCRC, and MHCC (Part 1)

DRP Elements	CMS	HSCRC	MHCC Current	MHCC Proposed
<i>Application Review</i>				
Application Form	Detailed form. Variable depending on privacy level	Detailed form. Variable depending on privacy level	Detailed form, but not specific to MCDB. No variation by privacy level.	Detailed form. Variable depending on privacy level
Review committee	ResDAC for LDS/PUF.CMS Privacy Board for RIF.	HSCRC internal review.	MHCC internal review.	MHCC Internal Review for LDS, PUF. Stakeholder review for RIF.
IRB	Yes, for RIF (CMS Privacy Board)	No IRB for review of applications, only pre-approved data sets.	Yes, for all external releases	Yes, for all external releases
Qualifications of Applicant	Formally Assessed	Formally Assessed	Formally Assessed	Formally Assessed

Environmental Scan of Claims Data Request Review Process Used by CMS, HSCRC, and MHCC

DRP Elements	CMS	HSCRC	MHCC Current	MHCC Proposed
<i>Data Security</i>				
Data Management Plan	Formal Requirement	Formal Requirement	Formal Requirement	Formal Requirement
DUA	Standardized form depending on level of privacy.	Standardized form.	Standardized form.	Standardized form depending on level of privacy.
Data Transfer	Secure media	Secure media	Secure media	Secure media
Data Destruction	Attestation	Attestation	Attestation	Attestation
<i>Support Functions</i>				
Documentation	Extensive, tailored to data product and privacy level	Extensive, though not public	Extensive	Extensive, tailored to data product and privacy level
Technical Support	ResDAC contracted to provide tech support. No charge.	HSCRC / DB Vendor	MHCC, Ad-hoc	DB Vendor

MCDB Data Request Review and Release Process



Discussion

- What are appropriate uses of MCDB data?
- Who are appropriate users of MCDB data?
- Who should review applications, and what should be the role of the IRB?

Next Steps

- Continue to incorporate workgroup feedback into formulation of the Data Release Policy
- Next Meeting (Date TBA)
 - Present DRP and solicit feedback
 - Review application forms, DUA's, and release procedure

MCDB Data Request Review and Release Process

Legend

AAG – Assistant Attorney General

CAIS – Director, Center for Analysis and Information Systems

CQA – Chief, Division of Cost and Quality Analysis

DBA – Chief, Database and Applications Development

DB Vendor – Database Vendor for the MCDB

MCDB – Maryland Medical Care Data Base

MHCC – Maryland Health Care Commission

NOAS – Chief, Network Operations and Systems